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## NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE  
Cabinet Secretary  
J. C. BORREGO  
Deputy Secretary

### Certified Mail – Return Receipt Requested

August 31, 2018

Mr. Juan Fuentes, City Manager  
City of Truth or Consequences  
505 Sims Street  
Truth or Consequences, New Mexico 87901

**Re: City of Truth or Consequences WWTP; Multi-Sector General Permit; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES #NMR053105; August 1, 2018**

Dear Mr.Fuentes:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston  
Environmental Protection Agency, Region 6  
NPDES Enforcement Branch (6EN-WS)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau (N2050)  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

**City of Truth or Consequences WWTP, NPDES #NMR053105**

**August 31, 2018**

**Page 2 of 2**

Robert Houston (Houston.Robert@epa.gov) is the USEPA Region 6's Stormwater Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

*/s/ Sarah Holcomb*

Sarah Holcomb  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Nancy Williams, USEPA (6EN-WC) by e-mail  
Amy Andrews, USEPA (6EN-WM) by e-mail  
David Esparza, USEPA (6EN-WM) by e-mail  
Robert Houston, USEPA (6EN)  
Darlene Whitten-Hill, USEPA (6EN) by e-mail  
Mike Kesler, NMED District III by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 3 1 0 5 11 12 1 8 0 8 0 1 17 18 ~ 19 S 20					
Remarks					
S E C T O R T T R E A T M E N T W O R K S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 2	71 N 72 N 73 74 75 80			

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>City of Truth or Consequences WWTP</b> <b>1595 Animal Shelter Road</b> <b>Truth or Consequences, New Mexico 87901 Sierra County</b>	Entry Time /Date 10:15 AM/8-1-18	Permit Effective Date 6-4-2015
	Exit Time/Date 4:00PM/8/1-18	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Sal Martinez, Lab Tech/575-894-7331</b> <b>Arnie Castaneda/ WWTP Superintendent /575-894-7331</b>		Other Facility Data SIC: 4952
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Mr. Juan Fuentes, 505 Sims Street, Truth or Consequences, New Mexico 87901/</b> <b>City Manager/575-894-6674 ext. 320</b>		GPS: <b>N. 33.11472</b> <b>W. -107.282458</b>
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Inspectors Jennifer Foote (NMED) and Amy Andrews (EPA) arrived on site and explained the purpose of the inspections and presented credentials to Mr. Sal Martinez, Lab Tech. We were later joined by Mr. Arnulfo Castaneda A CEI for the NPDES Individual Permit for the POTW was also conducted concurrently on this day by EPA staff. Mr. Castaneda provided the SWPPP for review and guided us on a tour of the facility. An exit interview was conducted before the inspectors departed the facility.
- See attached sheets for further details.
- Note: Uncertified SWPPP, no routine facility inspections, no quarterly visual assessments, and no training are repeat violations from 2016 inspection.

Name(s) and Signature(s) of Inspector(s) <b>Jennifer Foote /s/ Jennifer Foote</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB 505-827-0596</b>	Date <b>8/30/18</b>
Signature of Management QA Reviewer <b>Sarah Holcomb, Program Manager /s/ Sarah Holcomb</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB 505-827-2798</b>	Date <b>8/31/18</b>

## NPDES Industrial Storm Water Checklist (MSGP)

<u>National Database Information</u>		<u>General</u>	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053105	Telephone	505-827-0596
Inspection Date	8/1/18	Entry Time	10:15am
Inspector Type (circle one)	<input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	4:00pm
Facility Sector/ SIC/Activity Code	Sector T Treatment Works/ SIC 4952	Signature	/s/ Jennifer Foote

<u>Facility Location Information</u>			
Name/Location/ Mailing Address	City of Truth or Consequences WWTP 1595 Animal Shelter Road, Truth or Consequences, New Mexico, 87901		
GPS Coordinates	Latitude	33.11472	Longitude      -107.282458
Receiving Water(s)	Rio Grande Caballo Reservoir to Elephant Butte Reservoir- 20.6.4.103 NMAC		

<u>Contact Information</u>		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mr. Juan Fuentes/City Manager	575-894-6674 ext. 320
Facility Contact	Sal Martinez, Lab Tech Arnie Castaneda, WWTP Superintendent	575-894-7331
Authorized Official(s)	Mr. Juan Fuentes/City Manager	575-894-6674 ext. 320

<u>Basic Permit Information</u>			<u>Basic SWPPP Information</u>		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Operational Date	1977		SWPPP Implementation Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI/Application Date	9/30/2015		SWPPP Date	August 2015	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input type="checkbox"/> N <input checked="" type="checkbox"/> N/A			

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			Notes:
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Copy of the NOI and acknowledgment letter from EPA?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Acknowledgment letter missing
Copy of the permit language?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> <li>• Routine facility inspection (4.1.3)</li> <li>• Quarterly visual assessment (4.2.3)</li> <li>• Benchmark monitoring (6.2.1.3).</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	unsigned
Is the storm water pollution prevention team identified (name or title)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Staff listed are no longer at facility
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			<b>Notes:</b>
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	General location map incorrectly provides location in Socorro and states discharge is to unnamed canal.
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site map is an aerial photo and has not been updated since 2015 and significant construction has occurred at the site.
Does the site map contain directions of storm water flow (indicated by arrows)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Flow arrow seems to indicate river is flowing opposite way. There are no flow arrows within the facility limits. Also, the North arrow is pointing West.
Does the site map contain locations of all existing structural control measures?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site map has not been updated for new construction as Per Part 4.2 of permit. Plan states there is an elevated road that acts as a berm around the perimeter, however, the road is not elevated (Photo 3).
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Rio Grande (Caballo Reservoir to Elephant Butte Reservoir) is impaired for DO. Plan states receiving waters are impaired for Mercury.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan describes that "Any excess stormwater inside the WWTP flows back to the facility headworks through a series of drains," No drains are shown on site map.
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan lists potential pollutants by building, but buildings are not identified on site map.
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all storm water monitoring points?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states facility does not discharge stormwater.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Outfall 001 is labeled on the SWPPP map and appears to be where sheet flow leaves the site, however the SWPPP states there is no stormwater discharge. The individual NPDES permit also refers to Outfall 001 and it is located in approximately the same area.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> <li>Fueling stations</li> <li>Vehicle and equipment maintenance and/or cleaning areas</li> <li>Loading/unloading areas</li> <li>Locations used for the treatment, storage or disposal of wastes</li> <li>Liquid storage tanks</li> <li>Processing and storage areas</li> <li>Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility</li> <li>Transfer areas for substances in bulk</li> <li>Machinery</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	New permanent diesel generator not shown on map(fueling area)
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A. SWPPP reports no significant spills or leaks have occurred.

## NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
<p>Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:</p> <ul style="list-style-type: none"> <li>Date</li> <li>Description of evaluation criteria</li> <li>List of the outfalls or onsite drainage points directly observed</li> <li>Different types of non-storm water discharges and source locations</li> <li>Actions taken such as a list of control measures for elimination.</li> </ul>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<p>Evaluated August 23, 2011. Presence of nonstormwater discharges should be re-evaluated every permit term, and after new construction.</p>
<p>Does salt storage occur at this facility?</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
<p>Does the SWPPP include a summary of storm water sampling data for the previous permit term?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<p>N/A</p>

  

<u>Controls to Reduce Pollutants</u>		Notes:	
<p>Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
<p>Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
<p>Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
<p>Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	



## NPDES Industrial Storm Water Checklist (MSGP)

<b><u>Controls to Reduce Pollutants</u></b>			<b>Notes:</b>
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	States spills are unlikely.
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Plan states chemical and fuel storage will be under covered shelter. Various 5 gallon pails were located outside.(photo 1)
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No training records were provided.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

<b><u>Controls to Reduce Pollutants</u></b>			<b>Notes:</b>
Does the SWPPP document erosion and sediment controls?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Erosion and sediment controls section includes information on buffer compliance and seems to indicate that a site map will show a buffer and additional controls. A site map showing construction plans was not included in the SWPPP.
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site has been regraded as part of construction, unknown what kind of stabilization will occur. Erosion has been occurring. (Photo 2)
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No training has occurred.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>			Notes:
<b>Routine Facility Inspections</b>			
Are routine facility inspections conducted at least quarterly while facility operating?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Not performed/documented, annual report refers to daily walkarounds.
Are inspections documented, including: <ul style="list-style-type: none"> <li>Date and time</li> <li>Name and signature of inspector</li> <li>Weather information and a description of discharge occurring at the time of the inspection</li> <li>Previously unidentified discharges from site</li> <li>Control measures needing maintenance or repairs</li> <li>Failed control measures that need replacement</li> <li>Incidents of noncompliance observed</li> <li>Additional control measures needed.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> <li>Inactive and unstaffed sites</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Quarterly Visual Assessment</b>			
Are quarterly visual assessments conducted?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	SWPPP states facility does not discharge. However, at least since construction has occurred, it appears that stormwater leaves the site at the area marked as Outfall 001 on the map, and possibly as sheet flow from other areas as well.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> <li>Within the first 30 minutes of discharge</li> <li>On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>Collected in a clean, clear glass or plastic container.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> <li>• Sample location</li> <li>• Sample collection date/time &amp; visual assessment date/time</li> <li>• Personnel collecting sample &amp; performing assessment and their signature</li> <li>• Nature of the discharge (runoff or snowmelt)</li> <li>• Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators)</li> <li>• Probable sources of contamination</li> <li>• If applicable, reason for not taking samples within 1<sup>st</sup> 30 minutes.</li> </ul>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> <li>• Adverse weather conditions</li> <li>• Climates with irregular storm water runoff</li> <li>• Areas subject to snow</li> <li>• Substantially identical outfalls (per 5.1.5.2)</li> <li>• Inactive and unstaffed sites.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Comprehensive Site Inspections</b>			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A- Per 2015 permit requirements, now incorporated in routine facility inspection
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Cover all areas of the facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Include observations of the following:</p> <ul style="list-style-type: none"> <li>Industrial materials, residue, or trash that may have or could come into contact with storm water</li> <li>Leaks or spills from industrial equipment, drums, tanks, and other containers</li> <li>Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site</li> <li>Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas</li> <li>Control measures needing replacement, maintenance, or repair</li> <li>All storm water control measures observed.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> <li>Date of inspection</li> <li>Names and titles of personnel making the inspection</li> <li>Findings from examination of areas of facility from Part 4.3.1</li> <li>All observations relating to implementation of control measures</li> <li>Any required revisions to the SWPPP resulting from inspection</li> <li>Any incidents of noncompliance identified OR certification that facility is in compliance with the permit</li> <li>A statement signed in accordance with Appendix B, Subsection 11</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A for Sector T
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Benchmark Monitoring</b>			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> <li>• Within the first 30 minutes of discharge</li> <li>• On discharges that occur at least 72 hours (3 days) from the previous discharge</li> <li>• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall</li> <li>• Prior to commingling.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A for Sector T
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

<b>Monitoring</b>			
<p>Is the average of the first four quarterly samples &gt; the parameter benchmark?</p> <ul style="list-style-type: none"> <li>Make the necessary modifications</li> <li>Continue quarterly monitoring</li> <li>Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA</li> <li>Natural background pollutant level documentation</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Exceptions, including (see 6.1 &amp; 6.2):</p> <ul style="list-style-type: none"> <li>Adverse weather conditions</li> <li>Climates with irregular storm water runoff</li> <li>Snowmelt</li> <li>Substantially identical outfalls (per 5.1.5.2)</li> <li>Inactive and unstaffed sites.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Effluent Limitations Monitoring</b>			
<p>Sampled once per year?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Follow-up requirements if discharge exceeds effluent limit (see 6.3)?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Other Required Monitoring</b>			
<ul style="list-style-type: none"> <li>State or Tribal provisions</li> <li>Discharges to impaired waters</li> <li>Additional monitoring required by EPA.</li> </ul>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<b>Reporting (Part 7)</b>			
<u>General</u>	Notes:		
<p>Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Is the annual report submitted by 45 days after conducting the comprehensive site inspection?</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Annual reports submitted 1/30/17 and 1/31/2018
<p>If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff</b>	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Flows from sludge areas drain to headworks, however, flow patterns at the new belt press building should be verified. New diesel generator area may flow offsite.</p>
<b>Good Housekeeping</b>	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Some 5 gallon containers were located outside of containment. (photo 1)</p>
<b>Preventative maintenance</b>	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Plan states facility performs monthly walk arounds, there is not documentation of this in the onsite SWPPP.</p>



## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>Spill Prevention and Response</b>	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>5 gallon containers were located outside of containment(photo 1). No overfill containment at fill valve on new diesel generator.</p>
<b>Erosion and Sediment Controls</b>	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Site has been recently graded as part of construction, stabilization has not yet occurred and some erosion was evident.(photo 2,3)</p>
<b>Management of Runoff</b>	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>SWPPP states that facility is graded to not discharge, however it appears that there is at least one location at the outfall gate where stormwater leaves the site(photo 4). The berm should be rebuilt in that area.</p>
<b>Salt Storage Piles</b>	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

## NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
<b>Waste, Garbage and Floatable Debris</b>	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>In general the site was orderly.</p>
<b>Evidence of non-storm water discharges</b>	<p>No non-stormwater discharges were observed on the day of the inspection.</p>
<b>Dust Generation and Vehicle Tracking of Industrial Materials</b>	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Roads are stabilized with gravel.</p>

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

Photographer: Jennifer Foote	Date: 8/1/18	Time: 2:40pm
City/County: Truth Or Consequences/Sierra County		State: New Mexico
Location: Truth Or Consequences WWTP		
Subject: pails located exposed to stormwater and not in containment		



**NMED/SWQB  
Official Photograph Log  
Photo # 2**

Photographer: Jennifer Foote	Date: 8/1/18	Time: 2:06pm
City/County: Truth Or Consequences/Sierra County	State: New Mexico	
Location: Truth Or Consequences WWTP		
Subject: erosion at recent construction site		





**NMED/SWQB  
Official Photograph Log  
Photo # 3**

Photographer: Jennifer Foote

Date: 8/1/18

Time: 2:06pm

City/County: Truth Or Consequences/Sierra County

State: New Mexico

Location: Truth Or Consequences WWTP

Subject: Road on south side of site is not elevated 1' to act as a berm



**NMED/SWQB  
Official Photograph Log  
Photo # 4**

Photographer: Jennifer Foote

Date: 8/1/18

Time: 2:06pm

City/County: Truth Or Consequences/Sierra County

State: New Mexico

Location: Truth Or Consequences WWTP

Subject: Discharge location at SE corner of site at gate



Attachment 1  
Site Map Detail

